

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

JENNIFER HOUSER, as special §
administrator of the estate of §
Morgan Angerbauer, §
Plaintiff §
§
v. §
§
LASALLE MANAGEMENT COMPANY, LLC §
d/b/a LASALLE CORRECTIONS; LASALLE §
CORRECTIONS, LLC; LASALLE §
SOUTHWEST; RODNEY COOPER, §
in his official capacity; §
CHRIS BELL, in his official capacity; §
ROBERT PAGE, in his official capacity; §
BRITTANY JOHNSON, in her §
individual and official capacities; §
REGINA LYNCH, in her individual §
and official capacities; §
JANE DOES #1-10; and JOHN DOES §
#1-10, §
Defendants §

No. 5:16 CV 129

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

COME NOW, the parties through counsel of record and submit this Joint Motion to Stay All Deadlines and Notice of Settlement and state and represent to the court the following:

1. All matters and controversy between the parties have been settled in principle.
2. Defendants agree to pay, and Plaintiff, Victoria Leigh, Special Administrator of the Estate of Morgan Angerbauer, agrees to accept the sum of \$200,000 in full and final

settlement of all claims brought, or which may be brought, against Defendants as a result of the events made the basis of Plaintiff's Complaint and all amended Complaints. There are no contingencies, however, it may be necessary for the terms of settlement to be presented to the presiding probate judge in case number PR-2016-146-1 in the Circuit Court of Miller County, Arkansas Probate Division "In the Matter of the Estate of Morgan Angerbauer".

3. The parties jointly request that the court stay for thirty (30) days all applicable deadlines contained in the court's Docket Control Order.

4. The parties stipulate to the court that in the event any issues arise in formalizing the settlement papers, it is agreed that those issues will be submitted to the court for final resolution.

5. This matter was scheduled for mediation before United States Magistrate Judge Caroline Craven on November 28, 2017. Notice has been provided to Judge Craven's staff that the mediation is unnecessary due to this notice of settlement.

Respectfully submitted,

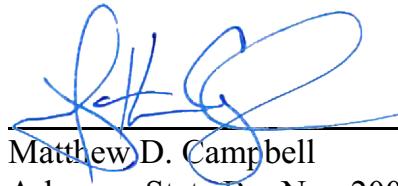


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